

# Exhibit G

1 KATHRYN E. CORBET and ) SUPERIOR COURT OF NEW JERSEY  
ERIC R. CORBET, ) LAW DIVISION - BERGEN COUNTY  
2 ) DOCKET NO. BER-L-14589-14MCL  
Plaintiffs, )  
3 ) MASTER DOCKET  
vs. ) NO. BER-L-11575-14  
4 )  
ETHICON, INC., ETHICON )  
5 WOMEN'S HEALTH AND )  
UROLOGY, A Division ) CIVIL ACTION  
6 of Ethicon, Inc., ) In Re  
GYNECARE, JOHNSON & ) Pelvic Mesh/Gynecare  
7 JOHNSON AND JOHN ) Litigation  
DOES 1-20, )  
8 ) Case No. 291 CT  
Defendants. )

9  
10  
11 The video-recorded deposition of  
12 DENISE M. ELSER, M.D., taken before Pauline M.  
13 Vargo, an Illinois Certified Shorthand Reporter,  
14 C.S.R. No. 84-1573, at the Le Meridien Chicago -  
15 Oakbrook Center, Discovery Boardroom, 9th Floor,  
16 2100 Spring Road, Oak Brook, Illinois, on  
17 November 5, 2015, at 9:14 a.m.

18  
19  
20  
21  
22  
23  
24 GOLKOW TECHNOLOGIES, INC.  
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25 Deps@golkow.com

1           A.       Well, I'm not a person who works in a  
2   lab studying materials all day, but I am familiar  
3   with the Amid classifications and which type of  
4   mesh seem to heal well in the pelvis as compared to  
5   other types of mesh.

6           Q.       Okay. You looked at other  
7   classifications beside the Amid classification?

8           A.       No.

9           Q.       Have you ever looked at studies that  
10   show what the pore size of the mesh is under  
11   stress?

12                   MR. SNELL: Form.

13           A.       I have seen that.

14           Q.       Are you going to be offering opinions at  
15   trial about the pore sizes of the mesh?

16           A.       If I'm asked about them.

17                   MR. SNELL: And I will say she has  
18   identified as macroporous, so those opinions  
19   will be elicited at trial.

20                   MR. GRAND: All right. We will take  
21   that up in motion practice.

22   BY MR. GRAND:

23           Q.       You don't consult as a materials expert,  
24   correct?

25                   MR. SNELL: Form.

1 A. No.

2 Q. And you have never designed a mesh,  
3 correct?

4 A. No.

5 Q. And you haven't studied explants of  
6 mesh, correct?

7 MR. SNELL: Form.

8 A. No.

9 Q. And have you done any research into the  
10 effects of -- scratch that.

11 Strike that.

12 Okay. On the next page you state, "I  
13 have used the TVT for about 17 years and noticed no  
14 clinical difference between mechanical and  
15 laser-cut mesh."

16 Have you reviewed internal documents by  
17 Ethicon in which they know the difference between  
18 mechanical and laser-cut mesh?

19 MR. SNELL: Actually, objection,  
20 foundation on that one.

21 BY MR. GRAND:

22 Q. Have you reviewed any of the Ethicon's  
23 internal documents relating to the differences  
24 between mechanical and laser-cut mesh?

25 A. It's been a while. I have read some,